UNITED STATES DISTRIC SOUTHERN DISTRICT OF	NEW YORK	
VRINGO INC. and VRINGO INFRASTRUCTURE, INC.,		Civ. Action No. 14-cv-4988 (LAK)
	Plaintiffs,	
-against-		
ZTE CORPORATION and Z	TE (USA) INC.,	
	Defendants.	
ZTE CORPORATION,	A	Civ. Action No. 15-cv-0986 (LAK)
	Plaintiff,	13-cv-0700 (L/IIK)
-against-		
VRINGO INC. and VRINGO INFRASTRUCTURE, INC.,		
	Defendants.	

NOTICE OF MOTION TO MODIFY THE COURT'S JULY 24, 2015 ORDER

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law in support of this motion, the Declaration of Wendy L. Wysong dated August 5, 2015 and the exhibits attached thereto, ZTE Corporation and ZTE (USA) Inc. (collectively, "ZTE"), by their undersigned attorneys, will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and at a time designated by the Court, for an order granting their Motion to Modify the Court's July 24, 2015 Order so as to allow the deposition of Guo Xiaoming to take place outside

the United States.

Dated: New York, NY August 5, 2015

CLIFFORD CHANCE US LLP

s/ Jeff E. Butler

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